

**EPSTEIN SACKS PLLC**  
**ATTORNEYS AT LAW**  
**100 LAFAYETTE STREET - SUITE 502**  
**NEW YORK, N.Y. 10013**  
**(212) 684-1230**  
**Fax (212) 571-5507**

**BENNETT M. EPSTEIN: (917) 653-7116**  
**SARAH M. SACKS: (917) 566-6196**

December 10, 2024

Hon. Colleen McMahon  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Filed on ECF

*United States v. Emmanuel Torres*  
24 Cr. 474

Dear Judge McMahon:

We represent Emmanuel Torres pursuant to the Criminal Justice Act. He is currently scheduled to be sentenced by the Court on January 6, 2025. We write to seek an adjournment of his sentencing hearing until the beginning of March. This is our first request for an adjournment. We ask for this adjournment because we need the additional time to effectively prepare for sentencing, including meeting with our client, obtaining character letters on his behalf and preparing a comprehensive sentencing submission. In addition, we ask for a date in the beginning of March since Mr. Torres' father is scheduled to travel between New York and the Dominican Republic over the next two months, but will be in New York at the beginning of March and would like to attend his son's sentencing.

We have discussed this request with AUSA Benjamin Gianforti on behalf of the Government and he has no objection to this request.

Respectfully submitted,  
*Sarah M. Sacks*